

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF HEARING TO APPROVE DISCLOSURE  
STATEMENT AND PLAN CONFIRMATION PROCEDURES**

**PLEASE TAKE NOTICE** that on August 31, 2021 USA Gymnastics, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”) filed the *Debtor’s Motion For Order Approving The Disclosure Statement And Plan Confirmation Procedures* [Dkt. 1553] (the “**Motion**”), which has been set for a hearing (the “**Disclosure Statement Hearing**”) on **October 4, 2021 at 10:30 a.m. (prevailing Eastern time) in person in Courtroom 329, 116 U.S. Courthouse, 46 East Ohio Street, Indianapolis, Indiana 46204.**

**PLEASE TAKE FURTHER NOTICE** that a dial-in telephone number for interested parties to listen to the Disclosure Statement Hearing, but not actively participate, is 1-888-273-3658, passcode: 9247462#.

**PLEASE TAKE FURTHER NOTICE** that, at the Disclosure Statement Hearing, the Debtor shall seek approval of: (1) *USA Gymnastics’ Disclosure Statement For Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1552] (the “**Disclosure Statement**”); (2) other materials included in solicitation packages (the “**Solicitation Packages**”) to be distributed to holders of claims entitled to vote to accept or reject the *Joint Chapter 11 Plan Of Reorganization Proposed By USA Gymnastics And The Additional Tort Claimants Committee Of Sexual Abuse Survivors* [Dkt. 1551] (the “**Plan**”); and (3) procedures governing the manner in which the Plan Proponents shall solicit and tabulate votes to accept or reject the Plan.

**PLEASE TAKE FURTHER NOTICE** that any objections to the Disclosure Statement, the Solicitation Packages, or the Motion must: (1) be in writing; (2) conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the United States Bankruptcy Court for the Southern District of Indiana, and any other orders of the Bankruptcy Court; (3) state the name and address of the objecting party and the nature of such party’s claim against the Debtor; and (4) state with particularity the basis and nature of any objection to approval of the Disclosure Statement, Solicitation Packages, or Motion and, if practicable, provide a proposed modification or additional suggested language to amend the Disclosure Statement, Solicitation Packages, or Motion in a manner that would resolve such objection. Any objections must be filed with the Bankruptcy Court no later than **September 29, 2021 at 11:59 p.m. (prevailing Eastern time) (the “Objection Deadline”)**, and served so as to be actually received by the parties below on or before the Objection Deadline, which service may be through the CM/ECF system, with courtesy copies

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 1099 N. Meridian St., Suite 800, Indianapolis, Indiana 46204.

by email:

- (a) Counsel to the Debtors, Jenner & Block LLP, 353 N. Clark St., Chicago, Illinois 60654 (Attn: Catherine Steege (csteege@jenner.com) and Melissa M. Root (mroot@jenner.com));
- (b) Counsel to the Survivors' Committee, (i) Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, California 90067 (Attn: James I. Stang (jstang@pszjlaw.com), Ilan D. Scharf (isharf@pszjlaw.com), and Joshua M. Fried (jfried@pszjlaw.com)), and (ii) Rubin & Levin, P.C., 135 N. Pennsylvania Street, Suite 1400, Indianapolis, Indiana 46204 (Attn: Meredith R. Theisen (mtheisen@rubin-levin.net) and Deborah J. Caruso (dcaruso@rubin-levin.net));
- (c) The Office of the United States Trustee, 101 W. Ohio St., Suite 1000, Indianapolis, Indiana 46204 (Attn: Laura A. DuVall (Laura.DuVall@usdoj.gov)).

**PLEASE TAKE FURTHER NOTICE** that objections to the Disclosure Statement, Solicitation Packages, or Motion not filed as set forth above may be deemed waived and not be considered by the Court.

**PLEASE TAKE FURTHER NOTICE** that any replies to objections to the Disclosure Statement, Solicitation Packages, or Motion must be filed with the Bankruptcy Court no later than **October 1, 2021 at 11:59 p.m. (prevailing Eastern time)**.

**PLEASE TAKE FURTHER NOTICE** that the Disclosure Statement may be modified without further notice prior to or as a result of the Disclosure Statement Hearing.

**PLEASE TAKE FURTHER NOTICE** that, to the extent the Court determines to hold the Disclosure Statement Hearing remotely, the Debtor will file (but will not serve) an amended notice of the Disclosure Statement Hearing on the Court's docket, and will also post the amended notice of the Disclosure Statement Hearing on its website and on its restructuring website.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion, the Disclosure Statement, and the other materials in the Solicitation Packages may be accessed through the case website at: <https://omniagentsolutions.com/usagymnastics>, or by contacting the Debtor's attorneys, on PACER, or from the Clerk of the Court.

Dated: August 31, 2021

**JENNER & BLOCK LLP**

By: /s/ Catherine Steege  
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